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9 CITIBANK, N.A.

10  
11 UNITED STATES DISTRICT COURT  
12 SOUTHERN DISTRICT OF CALIFORNIA

13 MARISSA GLOVER,  
14 v.  
15 Plaintiff,  
16 CITIBANK, N.A.; AND, EQUIFAX  
17 INFORMATION SERVICES, LLC,  
18 Defendants.

19 Case No. 3:16-cv-1786-BEN-BLM

20 DEFENDANT CITIBANK, N.A.'S  
21 MOTION FOR LEAVE TO FILE  
22 DECLARATION OF WALTER M.  
23 GOLDEN IN SUPPORT OF  
24 REPLY IN SUPPORT OF  
25 MOTION TO COMPEL  
26 ARBITRATION UNDER SEAL

27 United States District Judge Roger T.  
28 Benitez

DMWEST #15028125 v1

Action Filed: July 11, 2016

Defendant Citibank, N.A. (“Citibank”) respectfully moves this Court for an order permitting it to file the Declaration of Walter M. Golden In Support of Reply In Support of Motion to Compel Arbitration, and its accompanying exhibits, under seal.

5 As grounds for this motion, Citibank states as follows:

6       1.     Golden’s Declaration and its accompanying exhibits contain substantial  
7 personally identifiable information of the plaintiff, Marissa Glover (“Glover”),  
8 which require redaction pursuant to Federal Rule of Civil Procedure 5.2, as well as  
9 Section 1(h) of the United States District Court for the Southern District of  
10 California’s Electronic Case Filing Administrative Policies and Procedures Manual.

11       2. Because a the key issue in Citibank's pending Motion to Compel  
12 Arbitration is establishing Glover's business relationship with Citibank, use of  
13 unreacted exhibits, including identity documents such as Glover's Driver's License,  
14 is necessary.

15 WHEREFORE, Citibank respectfully requests this Court to enter an order  
16 authorizing Citibank to file the Golden Declaration as well as its accompanying  
17 exhibits under seal. Pursuant to Section 2(j) of the United States District Court for  
18 the Southern District of California's Electronic Case Filing Administrative Policies  
19 and Procedures Manual, as well as CivLR 79.2(c), Citibank will e-mail a Proposed  
20 Order authorizing the filing of the Golden Declaration under seal to the Court.

21 | PAGED: October 24, 2016

Respectfully submitted,

**BALLARD SPAHR LLP**

Scott M. Pearson

# Taylor Steinbacher

By: /s/ Taylor Steinbacher  
Taylor Steinbacher

Attorneys for Defendant  
**CITIBANK, N.A.**

1                   **PROOF OF SERVICE**

2                   I am a resident of the State of California, over the age of eighteen years, and  
 3                   not a party to the within action. My business address is **BALLARD SPAHR**  
 4                   ~~LLP~~, 2029 Century Park East, Suite 800, Los Angeles, CA 90067-2909. On  
 October 24, 2016, I served the within documents:

5                   **DEFENDANT CITIBANK, N.A.'S MOTION FOR LEAVE TO FILE**  
 6                   **DECLARATION OF WALTER M. GOLDEN IN SUPPORT OF REPLY IN**  
 7                   **SUPPORT OF MOTION TO COMPEL ARBITRATION UNDER SEAL and**  
 8                   **DECLARATION OF WALTER M. GOLDEN IN SUPPORT OF REPLY IN**  
 9                   **SUPPORT OF MOTION TO COMPEL ARBITRATION**

- 10                   **BY FAX:** by transmitting via facsimile the document(s) listed  
                       above to the fax number(s) set forth below on this date before  
                       5:00 p.m.
- 11                   **BY HAND:** by personally delivering the document(s) listed  
                       above to the person(s) at the address(es) set forth below.
- 12                   **BY MAIL:** by placing the document(s) listed above in a  
                       sealed envelope with postage thereon fully prepaid, in the  
                       United States mail at Los Angeles, California addressed as set  
                       forth below.
- 13                   **BY OVERNIGHT MAIL:** by causing document(s) to be  
                       picked up by an overnight delivery service company for  
                       delivery to the addressee(s) on the next business day.
- 14                   **BY PERSONAL DELIVERY:** by causing personal delivery  
                       by FIRST LEGAL NETWORK of the document(s) listed  
                       above to the person(s) at the address(es) set forth below.
- 15                   **BY CM/ECF:** by electronically transmitting a copy of said  
                       document(s) to the Clerk's Office using the CM/ECF System for filing  
                       and transmittal of a Notice of Electronic Filing to the aforementioned  
                       CM/ECF registrants.

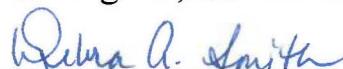
<p>22                  Abbas Kazerounian    23                  Kazerounian Law Group, APC    24                  245 Fischer Avenue    25                  Suite D1    26                  Costa Mesa, CA 92626    27                  (800) 400-6808    28                  Fax: (800) 520-5523                          Email: ak@kazlg.com</p>	<p>22                  Attorneys for Plaintiffs</p>
<p>22                  Clark Ovruchesky    23                  Law Office of Clark Ovruchesky    24                  750 B Street    25                  Suite 3300    26                  San Diego, CA 92101    27                  619-587-4490</p>	<p>22                  Attorneys for Plaintiffs</p>

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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 24, 2016 at Los Angeles, California.

  
Debra A. Smith